

# **EXHIBIT 68**

## **Redacted Excerpts from the Deposition of Cung Le**

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon )  
Fitch, Brandon Vera, Luis Javier )  
Vazquez, and Kyle Kingsbury on )  
behalf of themselves and all )  
others similarly situated, )

Plaintiffs, )

vs. )

Zuffa, LLC, d/b/a Ultimate )  
Fighting Championship and UFC, )

Defendants. )

Case No. 2:15-cv-  
01045-RFB- (PAL)

VIDEO DEPOSITION OF CUNG LE

Taken at the Offices of Boies, Schiller & Flexner  
300 South 4th Street, Suite 800  
Las Vegas, Nevada

On Tuesday, April 11, 2017  
At 8:39 a.m.

Reported by: Jane V. Efaw, CCR #601, RPR

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1 me. He's all, Well, when's your next appointment? I  
2 said, Next week. I believe it was Thursday. He's  
3 all, As soon as he clears you. He pats me on the  
4 back. Let me know right away so I can announce your  
5 fight. I'm like, Dana, I don't think he's going to  
6 clear me. I can't even train on it for another four  
7 weeks. He's all, Well, like I said, call me and let  
8 me know when he clears you. I didn't have -- I  
9 didn't say anything. I said, okay. And then Lorenzo  
10 and Dana said, have a good night. I leave.

11 My agent had texted me. He said he had to  
12 go. And I went back with my friend who drove up  
13 there also. And my friend was a little bit drunk.  
14 So he fell asleep, and another guy was driving. And  
15 my phone started blowing up. I looked at my text.  
16 And I swear, it must have been two dozen of my  
17 friends saying, Congratulations, you're going to be  
18 fighting the legend, Rich Franklin. I can't wait for  
19 the fight. I'm like, What the fuck? I start calling  
20 Dana. No answer. Now I'm frustrated. I don't know  
21 what to do. So I go to my appointment on Thursday.  
22 He checked it out. It was still painful. And he  
23 pushed it a certain way because I said I need to get  
24 back in there. I need to fight. He says, Cung, I  
25 can't clear you. I says, What can I do? I mean --

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1 you know, I can't clear you. This is unsafe. You're  
2 what, seven weeks out? I can't remember exactly how  
3 many weeks out. But this -- I'm not going to clear  
4 you. So I left, called up Dana. I said, Hey, Dana,  
5 he's not going to clear me. Dana's all, What? Why  
6 is he not going to clear you? It's only a bone  
7 bruise. It's a bruise, Cung. I'll go back next week  
8 and see what I can do. Well, make sure he clears  
9 you. I get the hint. So the following week, I get a  
10 bunch of Naproxen. I take it. He messes with my  
11 foot. He says, you don't feel any pain? I said,  
12 Nope. You got to clear me to fight. It's your body,  
13 Cung. I'm suggesting -- I'm telling you not to  
14 fight. I said, You know how it is in pro football.  
15 I'm sure you cleared some guys that shouldn't be  
16 cleared, right? Not me. Well, my foot's okay, so  
17 you can clear me, right? My career depends on it.  
18 He said, Yup, I'll clear you.

19 I sucked it up. Went in there out of shape.  
20 Felt fat. I couldn't run. I watched a ton load of  
21 videos. And probably got a gift from God with the  
22 win. I mean the list goes on. I'll just keep  
23 continuing.

24 Q. Let me ask you a couple questions. After  
25 your wife went into the emergency room, you said

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1 lawyers told you to get on the plane, I guess, to  
2 China. Which lawyers are you referring to?

3 A. Mersch. I don't remember. I was just too  
4 emotional. Mersch or the other dude.

5 Q. So lawyers for the UFC?

6 A. Yup. Because Dana wouldn't answer my calls.  
7 So I had to call somebody. I had to call the  
8 receptionist.

9 Q. Before you got on the plane, you did not  
10 speak to Dana White; is that correct?

11 A. Nope.

12 Q. You spoke with the lawyers for the UFC, and  
13 that included Mr. Mersch?

14 A. One of those guys.

15 Q. So a lawyer, you're not sure who, for the  
16 UFC told you to get on the plane; is that correct?

17 A. Yup.

18 Q. And after you arrived in China, did you talk  
19 to Dana White about the situation with your wife?

20 A. Yes, I did.

21 Q. And what did he say to you?

22 A. "I'm sorry to hear that."

23 Q. Did he say anything else to you about  
24 whether you should get on the plane?

25 A. He said he was busy. I said, I need to call

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1 you. I need a few days to stay with my wife. Sorry  
2 to hear that, Cung.

3 Q. Did he tell you anything about whether you  
4 should have gotten on the plane?

5 A. Nope.

6 Q. Did you speak to anybody --

7 A. He actually said, I'm glad you're there in  
8 China. Just remember that you're me over there.  
9 You're the Dana White of China. And make us proud.

10 Q. Did you talk to anybody else, other than the  
11 lawyers you don't recall from the UFC and Dana White,  
12 after you arrived to China about what -- about the  
13 situation with your wife and the ER and you getting  
14 on the plane?

15 A. You know what? I talked to a lot of people  
16 when I got there.

17 Q. Did you talk to anybody at UFC?

18 A. Yeah. Whoever was part of the show. I  
19 talked to Mark Fisher. I talked to, I believe it was  
20 Dan. He was the guy who ran the Ultimate Fighter.  
21 And they're just like, Oh, man, I wouldn't have left.  
22 You did have the same contract. You would have been  
23 sued for \$2 million.

24 Q. Did anyone from UFC say, If we would have  
25 known, we would have told you not to get on the

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<p>1 plane?</p> <p>2 A. No. They were just happy I was there.</p> <p>3 Q. How long -- to prepare for this deposition,</p> <p>4 you met with your lawyers; right?</p> <p>5 A. What?</p> <p>6 Q. To prepare for this deposition, did you meet</p> <p>7 with your lawyers?</p> <p>8 A. I did.</p> <p>9 Q. Did you meet -- how long did you meet with</p> <p>10 them?</p> <p>11 A. Good God. The day I came in was, I guess --</p> <p>12 I came in I guess two days ago. Just yesterday we</p> <p>13 met.</p> <p>14 Q. So you spent some time yesterday preparing</p> <p>15 for this deposition with your lawyers; is that</p> <p>16 correct?</p> <p>17 A. That is correct.</p> <p>18 Q. Did you spend most of the day doing that?</p> <p>19 A. Yeah. I believe we did.</p> <p>20 Q. All right. And you've named a number of</p> <p>21 topics as to why the -- in your view the UFC's been</p> <p>22 unfair. You mentioned a contract to give away</p> <p>23 licenses. You mentioned contracts that can be</p> <p>24 extended forever, but the fighters could be cut. You</p> <p>25 mentioned show fees versus win bonuses. You</p>	<p>1 we discussed -- that you discussed as to why you</p> <p>2 believe the UFC is unfair, and I asked you if there</p> <p>3 are any other issues that you wanted to list.</p> <p>4 A. There's a few others.</p> <p>5 Q. And just to help you with this question, if</p> <p>6 you want to list them, and then I could ask you any</p> <p>7 follow-up questions. You don't have to say</p> <p>8 everything about the topic. But for purposes of this</p> <p>9 question, if you would list what's next.</p> <p>10 A. I felt like I was treated very unfairly with</p> <p>11 a contract that I believe that Michael Mersch had</p> <p>12 sent me a new contract. This was right before I had</p> <p>13 to leave to China, and I was going to finish out my</p> <p>14 training camp in Vietnam so I could acclimate my body</p> <p>15 to the time zone. And it was two days before I had</p> <p>16 to leave, and I received an email with a new contract</p> <p>17 extension. And it was for 18 months.</p> <p>18 (Mr. Campbell walked in.)</p> <p>19 THE WITNESS: And six fights, the same deal</p> <p>20 that I signed the first time. No change in price.</p> <p>21 But they -- actually, I ignored it because I was</p> <p>22 focused on my fight. And I got a call from Michael</p> <p>23 Mersch, and he called me and says, did you get the</p> <p>24 new contract? I said I did. I haven't looked it</p> <p>25 over. My lawyer is out of town. I can't reach him.</p>
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<p>1 mentioned how minimum pay and the pay grade is too</p> <p>2 low. You mentioned the lockdown on uniforms that</p> <p>3 limits sponsors. You mentioned the topic of threats,</p> <p>4 and then you made some specific -- you talked about</p> <p>5 some specific threats, and I'll go over those, but</p> <p>6 you mentioned threats. You mentioned what you went</p> <p>7 through with your wife, and you mentioned what you</p> <p>8 went through with eventually fighting Rich Franklin</p> <p>9 and the statements that were made to you during that</p> <p>10 process. Are there any other examples of unfairness</p> <p>11 that come to your mind today --</p> <p>12 A. There is --</p> <p>13 Q. -- that would be part of this lawsuit, to</p> <p>14 your mind?</p> <p>15 A. There is. But this tea, for some reason I</p> <p>16 have to really pee bad. So if we can hold off.</p> <p>17 MR. ISAACSON: What we always say in this</p> <p>18 situation is, let's take a break.</p> <p>19 THE VIDEOGRAPHER: We are now going off the</p> <p>20 record, and the time is 9:53 a.m.</p> <p>21 (A brief recess was taken.)</p> <p>22 THE VIDEOGRAPHER: We are now back on the</p> <p>23 record. The time is approximately 10:03 a.m.</p> <p>24 BY MR. ISAACSON:</p> <p>25 Q. So Mr. Le, before the break, I listed topics</p>	<p>1 I tried to reach him, but you know, I'll get it to</p> <p>2 you when I come back. I'm getting ready to leave.</p> <p>3 He's all, I need it by today. And I said, Well, I</p> <p>4 can't sign anything till my lawyer looks at it</p> <p>5 because it's pretty thick. There's a lot of details</p> <p>6 in there. And he's all, Cung, you need to sign it.</p> <p>7 You need to get it back to me before you leave. I</p> <p>8 said, I can't do that. So, suit yourself. It was</p> <p>9 the first time that anyone from the UFC kind of like</p> <p>10 hung up on me and was a little bit rude. I thought</p> <p>11 nothing of it. I went to -- flew to Vietnam, and at</p> <p>12 the same time did extra press for them. Some they</p> <p>13 asked me to do, some I volunteered to do.</p> <p>14 We were having an issue with tickets because</p> <p>15 the fans were calling the gym I was at looking for</p> <p>16 tickets, and people were, you know, like jumping over</p> <p>17 and getting there. And then I called Dana, and I</p> <p>18 said, when I get there, when will my press be done?</p> <p>19 And he said, like all the other events. I believe</p> <p>20 your media day ends on -- he said Tuesday or</p> <p>21 Wednesday, and I'll be done because I was getting</p> <p>22 worn down by that time.</p> <p>23 I get to Macau the week of the fight. I get</p> <p>24 off the plane from Hong Kong, and we had to wait for</p> <p>25 the tram that goes across to Macau, and then on</p>

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And at the same time, after my press day, I was relieved of all my duties, but for some reason, my phone didn't stop ringing till Friday, and it was ringing in my room. And I remember on Friday, when we were going to the weigh-ins, I told Dana, Hey, my phone -- you guys still have me doing interviews. I thought press day was done. And he's all, Oh, sorry about that. Let me take care of it. It was that night. So when I went back to the room, I shut everything off. And the fight happened. It didn't turn out my way. I was kind of like a bloody mess. And all of a sudden, when I got rushed back to -- right after the fight within 15 minutes, they took me to the back room. No one tended all the shit that was on my face. And I was bleeding. And at the

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time, I didn't know that, but I had -- the bone that was underneath my nose was broken. I was in a lot of pain.

I told my trainer aide, Could you get me some kind of painkillers? And this nurse came in, and she was trying to draw blood at the same time. And he was like, Hey, can we get some painkillers? And she's, I have to do this, I have to do this in broken English. And then they were trying to draw blood. And my trainer was just telling me, you know, that I'm crazy for continuing to fight. He wanted to stop the fight, but I didn't let him.

And I look over, and there's a stream of blood squirting up because they missed -- then didn't do it right. They plugged that, and went to the other arm. And they drew blood from that arm and then got the blood. And after that, I didn't hear anything from UFC to see if I was okay or anything.

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And all of a sudden, my blood samples were gone, were destroyed for some reason. I don't know how they were destroyed for any -- even though if you're applying for a job, they would have to keep your blood tests for three months. And in this case, you know, it should have been kept for ten years. And then they said that they were going to announce it to the press. And right away, I went to a specialist to check on my -- the gland, the pituitary gland to see if something was wrong, and maybe something there was wrong. And I told him that, We're going to have an expert opinion, and please don't release it until I get my expert opinion.

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So that case, I felt like if I would have signed my extension, I probably would have never had to deal with that, but since I didn't sign my extension, you know, I got thrown underneath the bus. And my tests were destroyed. And you know, I go above and beyond for that company. Even like for the Rich Franklin fight, going back to the Rich Franklin fight, you know, I already had told Dana that I'm injured. He didn't care less. And he wants me to go on a ten-day media tour. I come back from my ten-day media tour. Now, this is like every day that I did, we had ten days that we did over a dozen, like, open workouts and press and media. Because it's China, big -- it could be a potential huge market for UFC.

And on the plane I was having issues with my elbow. And when I got -- when I woke up and I was back in San Francisco, I couldn't move -- I couldn't lock out my elbow. And I called Dana. I said, I'm having problems with my elbow. And he's all, Well, I



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1 don't know what to tell you, Cung. You're the main  
 2 event. So I was like, Fuck. Can't do my foot. Now  
 3 my elbow. So I go in. This was two days later. And  
 4 I get my elbow checked out. And Dr. Warren King  
 5 says, Cung, man, what the hell is going on with you?  
 6 You have some serious bone spur. Did someone kick  
 7 you there? How did it shake off? What's going on?  
 8 Well, you will need to fix it. I need to fight.  
 9 He's all, Well, okay. We're going to have to do some  
 10 surgery. I said, Okay. Well, do what you have to  
 11 do. Make sure I can still bend my arm so I can  
 12 fight. He's all, You're crazy, Cung. I don't know  
 13 why you're doing this. This is a huge risk to your  
 14 health, your life. I said, it's my career.

15 I got surgery. He said he didn't go in  
 16 through the front, but he went through the back,  
 17 pulled out some marbles that was probably broken off  
 18 during the several open workouts that I did in  
 19 Hong Kong, Guangzhou, Macau. So many different  
 20 cities that we went to. And I went on to fight six  
 21 weeks later or five weeks later.

22 Then the next time around, I told Dana -- it  
 23 was against Michael Bisping -- I said, Dana, I'm not  
 24 going to do that kind of crazy media tour. You're  
 25 going to have to shorten it up. He mentioned

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1 something about, I'm not a spring chicken anymore,  
 2 because he actually offered me a fight before the  
 3 Macau, and I said, I'll take it and I'll fight both  
 4 so I can finish my contract out. And he's all,  
 5 you're not a spring chicken. And he mentioned it  
 6 again.

7 And I said, Well, let's limit my media tour.  
 8 And he's all, I was only going to have you do three  
 9 days. I'm all, Okay, do three days. And I was like,  
 10 you know, I did my obligation, but there's always  
 11 something more. And Dana expects me to do, you know,  
 12 more, even after I'm done. It's where you can't  
 13 really say no because every fighter knows that if you  
 14 say no to the boss what happens. You get  
 15 blacklisted, or you get sat down. You get no fights.  
 16 Because they have the exclusive contract on you. And  
 17 you have nowhere else to go. They bought up  
 18 everyone.

19 So I agreed to do some of the stuff that he  
 20 wanted me to do for him that night, but I told him I  
 21 wanted to go train. I need to sleep. I'm tired.  
 22 I'm not that spring chicken anymore. And he's all,  
 23 Don't worry about it, Cung. We'll always take care  
 24 of you. So I did them. I did more work for him.  
 25 And I was upset about it because I wanted to get up

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1 the next morning and run, but he wanted to stay out  
 2 super late. It's like, What are my obligations?  
 3 Where does it stop? Because there is not a free  
 4 market. Because there's not another fight league  
 5 where I could just, like, say, you know, go out  
 6 yourself. Go do it yourself. You're so worried  
 7 about losing your job. It's like, you have no  
 8 choice. Whether he threatens you or he does it in  
 9 like a calm way or he pats you on the back, you know,  
 10 him and Lorenzo.

11 It's very, very, very stressful. Stressful.  
 12 You can't truly, you know -- even back then I was  
 13 having a hard time getting sponsors because the  
 14 sponsors will have to pay an outrageous amount just  
 15 to sponsor me. And I got one deal to go through  
 16 because I did them a favor during the media tour.  
 17 That's only the only reason why I got a chance to put  
 18 one other brand on my shorts, and that was a one-time  
 19 deal. And he didn't charge them.

20 BY MS. ISAACSON:

21 Q. So at this point, what I have that you've  
 22 listed as general topics -- and we mentioned these  
 23 before -- is that you feel the UFC has been unfair  
 24 because you have to sign away your likeness. The  
 25 contracts can be extended forever, but you can be

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1 cut. The show fees versus a win bonus. The minimum  
 2 pay or the pay grade is too low. The fact that  
 3 they've locked down the uniforms and taken away  
 4 sponsors, and you've just mentioned even before that,  
 5 it was hard to get sponsors. You mentioned threats.  
 6 You've mentioned the situation with your wife.  
 7 You've mentioned what happened with the Rich Franklin  
 8 fight and your foot. You mentioned the circumstances  
 9 around the HGH test and that entire event. And you  
 10 mentioned having to go above and beyond on a media  
 11 tour when you wanted to train.

12 Is there anything else that's missing -- is  
 13 there anything that you haven't mentioned that's  
 14 missing from this list?

15 A. Not that I can think of right now.

16 Q. All right. In terms of -- you mentioned  
 17 threats. Now, when you used the term "threat," you  
 18 said sometimes that's when Dana or Lorenzo speak  
 19 calmly or even pat you on the back, but their  
 20 statements cause stress; is that correct?

21 A. Yes. I was really stressed out when they  
 22 didn't acknowledge my foot being seriously injured  
 23 and telling me that I had to step up for the company.  
 24 And that I'm a company man, and make sure your doctor  
 25 clears you. I think I understand what that means

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1 because it was pretty direct.

2 Q. All right. Now you mentioned a threat by  
3 Joe Silva. Something that he said. Can you tell me  
4 what your understanding is of what Joe Silva said  
5 that you consider a threat?

6 A. Joe Silva mentioned -- not to me, but I  
7 think it was at some banquet -- that if you don't  
8 take the first fight, the second fight's going to  
9 be -- I don't know the exact word, but you're  
10 basically fucked.

11 Q. So you were not at this banquet; is that  
12 correct?

13 A. No. I heard about it.

14 Q. Who did you hear about it from?

15 A. I don't recall.

16 Q. Now, you mentioned that Dana White in your  
17 belief made threats to Jon Fitch and the fighters of  
18 AKA. Did you witness any of those threats?

19 A. I was there in the gym, and all the guys, we  
20 were supposed to train. No one would do any training  
21 except talking to each other and wondering what they  
22 were going to do about it.

23 Q. Did you hear Dana White say anything you  
24 consider threatening to Jon Fitch or the fighters of  
25 AKA?

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1 A. Yeah. I believe it was on -- it was a long  
2 time ago, and when I was there, they pulled it up.  
3 And I read about it. And I was shocked about what he  
4 was going to do because if Jon Fitch didn't sign his  
5 likeness away to the UFC, that no one from AKA will  
6 ever be able to fight for the UFC.

7 Q. When you say that you read about it and they  
8 pulled it up, what are you talking about?

9 A. They pulled it up on their phone. They were  
10 talking amongst each other. They're friends. I  
11 train with them. I -- we go to battle. We train  
12 with each other. We're like brothers. So while Jon  
13 was reading, I was reading it right here. Like if  
14 he's here, I'm reading here, and someone else is  
15 reading it.

16 Q. What is it you were reading on the phone of  
17 Mr. Fitch?

18 A. What Dana said. What Dana said about, you  
19 know, how none of the fighters at the AKA were going  
20 to be able to fight for the UFC.

21 Q. Were they showing you something that Dana  
22 White said that was being reported?

23 A. You know what? It was on a phone. It was  
24 on media. It was so long ago. I mean, I barely -- I  
25 was like -- it was like my rookie year coming into

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1 like the major leagues. Well, not the major leagues  
2 because the UFC is a major league, but I started  
3 every May. I was going, like, How is this going on?  
4 Why is this happening? I didn't understand. I did  
5 not understand. I just knew that back then I just  
6 wanted to fight, you know, and make money. You know,  
7 pay for my kids and take care of my kids, my family.

8 Q. So when you say that Dana White made a  
9 threat to Jon Fitch and AKA that was based on a media  
10 report, you don't remember what media report that you  
11 saw on a phone?

12 MR. DELL'ANGELO: Objection to the form.

13 BY MR. ISAACSON:

14 Q. Is that correct?

15 A. Yeah.

16 Q. Now, are there any threats by Joe Silva that  
17 you have personally heard or witnessed?

18 A. Not that I can think of right now.

19 Q. Are there any -- you've mentioned  
20 conversations that you had with Dana White,  
21 specifically about fighting Rich Franklin.

22 A. Uh-huh.

23 Q. Are there any other threats from Dana White  
24 to you that you personally witnessed -- that were  
25 made personally to you?

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1 MR. DELL'ANGELO: Objection to the form.  
2 You can answer the question.

3 THE WITNESS: Huh?

4 MR. DELL'ANGELO: You can answer the  
5 question.

6 BY MR. ISAACSON:

7 Q. I'm going to rephrase the question, because  
8 I stumbled over it.

9 You mentioned conversations you had with  
10 Dana White, specifically about fighting Rich  
11 Franklin. Are there any other circumstances where  
12 you feel that Dana White made threats to you?

13 A. One that just popped up in my head right  
14 now. That after the day -- it was exactly 21 days  
15 later, after they released my tests into the media,  
16 and they had to retract what they released because  
17 Dr. Catlin of -- I guess he would be the PEDs --  
18 considered guru of the PEDs -- performance enhancing,  
19 whatever you call it -- came onto social media and  
20 says, Well, Cung's test is actually -- your test  
21 saying that Cung tested for elevated levels is wrong.  
22 One, because you're supposed to test him when he's  
23 fasted and his heart rate is regular. And he should  
24 not be exercising or in any kind of activities that  
25 will increase his heart rate. That will increase his

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1 HGH levels.  
 2 And Dr. Catlin is the doctor -- his test was  
 3 the test that I believe is the one that got Lance  
 4 Armstrong for EPO. If I'm saying it wrong -- or  
 5 whatever it is. It's where they mix blood back into  
 6 your system, and you have more oxygen in your blood.  
 7 But he's the guy who had done ten years research, and  
 8 that's the test that the NFL uses.  
 9 And you know, I think he didn't completely  
 10 just stand up for me. He just stood up because his  
 11 ten-year research was being attacked by UFC's -- what  
 12 do you call it? You know, BS. On the 21 days where  
 13 UFC was supposed to release a statement saying that I  
 14 am no longer suspended and I am cleared, Dana White  
 15 calls me. And the first time he called, I didn't get  
 16 to my phone on time. I called him back. And then he  
 17 goes, Hey, Cung, I'm going to call you right back.  
 18 And then my wife was there, and she's all, They're  
 19 going to record you, Cung. I'm like that's fine.  
 20 So he called me back, and he goes, "Cung,  
 21 we're like family. You're our boy. But we all know  
 22 you did it. Look at your picture." I said, "Dana,  
 23 it took a year. I dieted. I trained for a year, and  
 24 I was not injured. Not like the other fights where  
 25 you said, 'Make it happen, Cung.'" What I did for

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1 the doctors and all that.  
 2 And he's all -- and he says, "Remember the  
 3 pitcher from the Yankees, Pettitte?" He's all, "He  
 4 just admitted it. That's what you need to do. You  
 5 need to admit it." I'm like, "I didn't do shit,  
 6 Dana. I'm not going to admit anything if I didn't do  
 7 it." He's all like, "We all know you did it." I'm  
 8 all, "Dana, I'm done here, man." And that was the  
 9 last time I talked to Dana.  
 10 Q. And so what you considered threatening about  
 11 that was that Dana said, "Look at your picture. We  
 12 know you did it. Admit it?"  
 13 A. He said I should just come clean and tell  
 14 the public. Just do it.  
 15 Q. And you thought it was threatening of him to  
 16 say you should just come clean?  
 17 A. To me, how I felt about my own personal  
 18 opinion, yeah.  
 19 Q. You also said that you thought the HGH tests  
 20 or the blood testing was given to you because of your  
 21 failure to sign an extension; correct?  
 22 A. Yup.  
 23 Q. All right. Has anybody at UFC ever said  
 24 anything to you connecting the taking of the blood  
 25 test with your not signing an extension?

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1 A. No.  
 2 Q. Do you have any basis for saying that the  
 3 blood test was given to you due to your failure to  
 4 sign an extension other than that's your sincere  
 5 belief?  
 6 A. That's my belief.  
 7 Q. Anything else you have to say other -- about  
 8 that other than you believe that?  
 9 A. Not that I can think of right now.

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1 being denied fights based on things you've heard from  
2 other fighters?

3 A. Or read on the media.

4 Q. All right. So all of your knowledge about  
5 any blacklisting would be based on things you heard  
6 from other fighters or that you read in the media?

7 A. Yeah. I think so.

8 Q. And how many fighters can you list today  
9 that you believe were blacklisted based on what you  
10 were told by other media and read in the media?

11 A. I don't remember.

12 Q. You mentioned a couple agents and lawyers  
13 who have worked for you. Not as part of this case,  
14 but as representing you in negotiations. Can you  
15 tell me any agents or lawyers who have represented  
16 you in negotiations with the UFC? If you would just  
17 list them by name.

18 A. I didn't -- I don't -- I don't believe they  
19 represented me. They gave me some advice.

20 Q. So tell me lawyers or agents who gave you  
21 advice with respect to the UFC, again, excluding  
22 lawyers having to do with this lawsuit?

23 A. With respect to the UFC, I don't understand  
24 that question.

25 Q. You know, your contract -- for example, you

20 Q. Other than what you've described so far,  
21 where Dana White spoke to you about your foot before  
22 the Rich Franklin fight and what he said to you about  
23 coming clean after the blood test, are there any  
24 other situations where you feel Dana White threatened  
25 you?

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1 MR. DELL'ANGELO: Object to the form.

2 THE WITNESS: Not that I can think of right  
3 now.

4 BY MR. ISAACSON:

5 Q. Have you observed Dana White threaten any  
6 other fighters?

7 A. Not that I can think of right now.

8 Q. Is there anybody else at UFC other than Dana  
9 White or Joe Silva that you have seen threaten other  
10 fighters?

11 A. I don't recall.

12 Q. Is there anyone other than Dana White at the  
13 UFC who you consider to have threatened you?

14 MR. DELL'ANGELO: Object to the form.  
15 Mischaracterizes the witness's testimony.

16 THE WITNESS: I don't think so.

17 BY MR. ISAACSON:

18 Q. You mentioned the subject of fighters can be  
19 blacklisted for not being given any fights. Did that  
20 ever happen to you?

21 A. No.

22 Q. Are there fighters that you saw that that  
23 happened to?

24 A. I heard of it.

25 Q. Is all of your knowledge of blacklisting or

1 said you want your lawyers to review your contracts.  
2 You mentioned agents who had spoken to the UFC.  
3 People who are representing you as part of your fight  
4 career.

5 A. Did I mention agents that have spoken to the  
6 UFC? I don't recall that.

7 Q. You've mentioned agents. I just want to  
8 get -- have you had agents working for you during the  
9 period you were with the UFC?

10 A. My agent, Brett Norensberg had really never  
11 done anything with my fight deals. He just supported  
12 me. He was a fight fan, and he comes out to watch me  
13 fight.

14 Q. And what is his background?

15 A. He does film and television.

16 Q. And --

17 A. He's actually Conor McGregor's agent, too.

18 Q. All right. And has he advised you with  
19 respect to your career at the UFC?

20 A. I don't remember.

21 Q. All right. Have you had agents who have  
22 spoken to the UFC on your behalf?

23 A. Not agents, no.

24 Q. Have you had lawyers who have spoken to the  
25 UFC on your behalf?

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<p>Page 70</p> <p>1 A. No.</p> <p>[REDACTED]</p>	<p>Page 72</p> <p>[REDACTED]</p>
<p>Page 71</p> <p>[REDACTED]</p>	<p>Page 73</p> <p>[REDACTED]</p> <p>20 Q. Right. Other than your lawyers who work on 21 this case, have you spoken to other fighters or 22 anyone else about this case? 23 A. Can you repeat that question, please? 24 Q. Sure. Have you been speaking about this 25 case to people other than your lawyers who represent</p>

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1 A. Correct.

2 Q. And at the end of that, you were still  
3 unhappy because although they had withdrawn the  
4 suspension, the UFC had not apologized to you;  
5 correct?

6 MR. DELL'ANGELO: Objection to the form.

7 THE WITNESS: At that point I was just happy  
8 that they withdrew. Whatever speculation that was  
9 brought up that I wasn't happy, I don't remember. I  
10 don't recall.

11 BY MR. ISAACSON:

12 Q. And after that, the UFC offered you another  
13 fight; correct?

14 A. Yes, correct.

15 Q. They offered you a fight at UFC 185 in  
16 Dallas, Texas; correct?

17 A. Yes. I believe it was somewhere in Texas.  
18 I guess it was Dallas.

19 Q. And you turned it down?

20 A. I did.

21 Q. Let bother you to -- tell me the different  
22 areas of the world where you've fought for either  
23 Strikeforce or UFC -- well, for Strikeforce.  
24 Different countries.

25 A. For Strikeforce I only fought in San Jose,

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1 California.

2 Q. And what about for UFC?

3 A. I fought in San Jose. I fought in  
4 Las Vegas. And then I fought in Macau.

5 Q. And before Strikeforce, tell me the  
6 countries where you fought, where you were paid?

7 MR. DELL'ANGELO: In mixed martial arts or  
8 any combat?

9 MR. ISAACSON: Yes, in MMA.

10 THE WITNESS: In MMA?

11 BY MR. ISAACSON:

12 Q. Yes.

13 A. Nowhere.

14 Q. What about in combat sports?

15 A. Just in the United States. Just in the  
16 States. Just in the U.S.

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1 record. The time is approximately 2:19 p.m.  
2 (A brief recess was taken.)  
3 THE VIDEOGRAPHER: We are now back on the  
4 record. The time is approximately 2:35 p.m.  
5 BY MR. ISAACSON:

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<p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 BY MR. DELL'ANGELO:</p> <p>23 Q. And who is Lawrence Epstein, if you know?</p> <p>24 A. He's a lawyer of the UFC.</p> <p>25 Q. And do you know who Marc Ratner is?</p>	<p>1 CERTIFICATE OF DEPONENT</p> <p>2 PAGE LINE CHANGE REASON</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15 * * * * *</p> <p>16</p> <p>17 I, CUNG LE, deponent herein, do hereby</p> <p>18 certify and declare the within and foregoing</p> <p>19 transcription to be my deposition in said action;</p> <p>20 that I have read, corrected and do hereby affix my</p> <p>21 signature to said deposition.</p> <p>22</p> <p>23 CUNG LE, Deponent</p> <p>24</p> <p>25</p>
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<p>1 A. I believe he works as the commissioning body</p> <p>2 of the fight, I think.</p> <p>3 Q. Is that for the UFC?</p> <p>4 A. Yes.</p> <p>5 MR. DELL'ANGELO: I have no further</p> <p>6 questions.</p> <p>7 MR. ISAACSON: No questions.</p> <p>8 THE VIDEOGRAPHER: This concludes the video</p> <p>9 deposition of Cung Le. We are now going off the</p> <p>10 record. The time is approximately 3:14 p.m.</p> <p>11 MR. DELL'ANGELO: Before we go off, I just</p> <p>12 want to note that we're going to read and sign. And</p> <p>13 we'd like to designate it confidential subject to</p> <p>14 review.</p> <p>15 THE REPORTER: And would you like a copy of</p> <p>16 the transcript, the same as last time?</p> <p>17 MR. DELL'ANGELO: Yes, same order.</p> <p>18 (Thereupon the taking of the</p> <p>19 deposition was concluded at</p> <p>20 3:15 p.m.)</p> <p>21 * * * * *</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 REPORTER'S CERTIFICATE</p> <p>2 STATE OF NEVADA )</p> <p>3 ) SS:</p> <p>4 COUNTY OF CLARK )</p> <p>5 I, Jane V. Efaw, CCR No. 601, do hereby certify:</p> <p>6 That I reported the taking of the deposition of</p> <p>7 the witness, CUNG LE, at the time and place</p> <p>8 aforesaid;</p> <p>9 That prior to being examined, the witness was by</p> <p>10 me duly sworn to testify to the truth, the whole</p> <p>11 truth, and nothing but the truth;</p> <p>12 That I thereafter transcribed my shorthand notes</p> <p>13 into typewriting and that the typewritten transcript</p> <p>14 of said deposition is a complete, true and accurate</p> <p>15 transcription of said shorthand notes taken down at</p> <p>16 said time, and that a request has been made to review</p> <p>17 the transcript.</p> <p>18 I further certify that I am not a relative or</p> <p>19 employee of counsel of any party involved in said</p> <p>20 action, nor a relative or employee of the parties</p> <p>21 involved in said action, nor a person financially</p> <p>22 interested in the action.</p> <p>23 Dated at Las Vegas, Nevada, this day of</p> <p>24 , 2017.</p> <p>25 Jane V. Efaw, CCR #601</p>